

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ASIAN-AMERICAN LICENSED BEVERAGE ASSOCIATION, et al.	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	Case No. 2:24-cv-06348
v.	:	
CITY OF PHILADELPHIA, et al.	:	<i>Jury Trial Demanded</i>
	:	
Defendants.	:	
	:	

**PLAINTIFFS' OMNIBUS RESPONSE IN OPPOSITION TO CITY DEFENDANTS' AND
COMMONWEALTH DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS'
AMENDED COMPLAINT**

Plaintiffs, Asian-American Licensed Beverage Association D/B/A Asian-American Licensed Beverage Association Of Philadelphia (“AALBA”), Yo Deli, Inc., Best Beer, Inc., Sky Beer Deli, Inc., Maya Investment Group, LLC, 7701 Ogontz, Inc., CDD 725, Inc. and Arab American Business And Professional Association Of The Delaware Valley (“AAB”) file this Omnibus Response in Opposition to Defendants, Cherelle Parker, In Her Official Capacity as Mayor of the City of Philadelphia, City of Philadelphia, David W. Sunday, Jr., In His Official Capacity as Attorney General of the Commonwealth of Pennsylvania, Pennsylvania State Police Bureau of Liquor Control Enforcement and Pennsylvania Liquor Control Board Motions to Dismiss Plaintiffs’ Amended Complaint and deny the facts and requests for relief described therein. For the reasons set forth in the accompanying memorandum of law, incorporated herein by reference, Defendants’ arguments pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6) fail.

Oral argument is requested.

WHEREFORE, the Motions to Dismiss should be denied in their entirety.

Respectfully submitted,

KANG HAGGERTY LLC

By: /s/ *Kyle Garabedian*

Edward T. Kang
Kyle Garabedian
Kelly Lavelle
123 S. Broad Street, Suite 1950
Philadelphia, PA 19109
P: (215) 525-5850
F: (215) 525-5860
ekang@kanghaggerty.com
kgarabedian@kanghaggerty.com
klavelle@kanghaggerty.com
Attorneys for Plaintiffs

Dated: February 24, 2025

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CERTIFICATE OF SERVICE

I, Kyle Garabedian, hereby certify on this 24th day of February 2025, I caused a true and correct copy of Plaintiffs' Omnibus Response in Opposition to City Defendants and Commonwealth Defendants' Motions to Dismiss Plaintiffs' Amended Complaint to be served upon the following via electronic mail:

Michael Pfautz, Deputy City Solicitor
 Ryan B. Smith, Deputy City Solicitor
 City of Philadelphia
 1515 Arch St., 15th Floor
 Philadelphia PA, 19102
 P: (215) 683-5233
 P: (215) 410-8264
 Michael.Pfautz@phila.gov
 Ryan.Smith@phila.gov

Nicole R. DiTomo, Chief Deputy AG
 15th Floor, Strawberry Square
 Harrisburg, PA 17120
 P: (717) 787 -2717
 nditomo@attorneygeneral.gov

Sarin V. Koesian-Frounjian, Deputy AG
 Office of the Attorney General
 1600 Arch St., Suite 300
 Philadelphia PA, 19103
 P: (215) 560-2128
 skeosianfrounjian@attorneygeneral.gov

/s/ Kyle Garabedian
 Kyle Garabedian

Dated: February 24, 2025